

# United States District Court

EASTERN DISTRICT OF TEXAS

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS

APR 3 2003

DAVID J. MALAND, CLERK

BY

DEPUTY

*E. Lopez*

UNITED STATES OF AMERICA

V.

WILLIAM J. KRAR

## CRIMINAL COMPLAINT

CASE NUMBER: 6-03M 12

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief On or about an unknown date, believed to be in January, 2002, in Smith county, in the

Eastern District of Texas defendant(s) did, (Track Statutory Language of Offense)

knowingly and without lawful authority did transport in and affecting interstate commerce via United States Parcel Service five or more false identification documents, including a North Dakota birth certificate, a Social Security card, a Vermont birth certificate, a West Virginia birth certificate, and a Defense Intelligence Agency Identification card,

in violation of Title 18 United States Code, Section(s) 1028(a)(1)

I further state that I am a(n) FBI Special Agent and that this complaint is based on the following facts:  
Official Title

See attached Affidavit

Continued on the attached sheet and made a part hereof:

☒ Yes☐ No*WJB* 4/3/03

Signature of Complainant

Sworn to before me and subscribed in my presence,

April 4, 2003

Date

at

Tyler, Texas

City and State

Harry W. McKee  
United States Magistrate Judge

Name &amp; Title of Judicial Officer

*H. W. McKee*

Signature of Judicial Officer

## **AFFIDAVIT**

Affiant, Bart B. LaRocca, Special Agent of the Federal Bureau of Investigation, being duly sworn, deposes and says:

(1) Affiant has been a Special Agent of the Federal Bureau of Investigation for five and a half years and is assigned to the Tyler, Texas Resident Agency of the Dallas Division of the Federal Bureau of Investigation.

(2) On August 15, 2002 Special Agent (SA) John Marley of the Federal Bureau of Investigation's (FBI) Newark, New Jersey Office advised the FBI's Dallas, Texas office that on January 24, 2002, the Middletown, New Jersey Police Department had contacted the FBI and advised that a private citizen, MICHAEL LIBECCI, of Staten Island, New York, had turned over a package that had been previously misdelivered by UPS and inadvertently opened by his family. After the package was opened, LIBECCI discovered it contained numerous identification documents in various names but bearing photographs of the same individual. After discovering the contents of the package, the LIBECCI turned it over to police.

(3) Special Agent Marley further advised affiant that among the identification documents in the package were a North Dakota birth certificate for ANTHONY LOUIS BRACH, a Social Security card for MICHAEL E. BROOKS, a birth certificate from the State of Vermont for a MICHAEL EDWARD BROOKS, a birth certificate from

West Virginia for a JOSEPH H. CURRY, and other photo identifications to include a United Nations Multinational Force Observer Identification card and a Defense Intelligence Agency (DIA) Identification card. Also enclosed with the items in the package was a letter from WILLIAM J. KRAR to the intended recipient of the false identifications, EDWARD S. FELTUS. The letter to FELTUS starts with the verbage "HOPE THIS PACKAGE GETS TO YOU O.K., WE WOULD HATE TO HAVE THIS FALL INTO THE WRONG HANDS."

(4) A further review of the enclosed documents revealed the package containing all of the documents was intended to be delivered to EDWARD S. FELTUS at 126 Cindy Street, Old Bridge, New Jersey, from a WILLIAM J. KRAR, at 4828 South Broadway, mail box #324, Tyler, Texas 75703, in the Eastern District of Texas.

(5) Special Agent Marley also advised affiant that on August 8, 2002, EDWARD FELTUS was interviewed by the FBI regarding the package of false documents. During the interview FELTUS stated he was a member of the "New Jersey Militia" and admitted to sending photos of himself (FELTUS) to KRAR with the understanding KRAR would have the false identification documents created for him. FELTUS advised the false identification documents were for him to have as an "ace in the hole" because he could not predict future events and they would give him peace of mind knowing he could use the documents to travel freely in the

United States.

(6) Affiant's investigation of KRAR'S return address of 4828 South Broadway #324, Tyler, Texas found it to be a post office box at a Mail Boxes Etc. business located at that address in Tyler, Texas.

(7) In October 2002 Affiant contacted BEE DAVIS, manager of the Mail Boxes Etc. at 4828 South Broadway, and was advised that KRAR'S Mail Boxes Etc. account, box #324, was set up on October 16, 2001 by a JUDITH L. BRUEY, born 04/19/1949. BRUEY had provided Mail Boxes Etc. with a New Hampshire's Driver's License and a home address of 12471 Oak Springs Road, Tyler, Texas. Also listed on the account application were the names CHELSEA DAWN PHILBRICK and WILLIAM KRAR. All of the names on the account for mailbox #324 were under the corporation name of IDC America. BEE DAVIS also provided Affiant with a copy of the completed Mail Boxes Etc. application for #324 and a photocopy of BRUEY'S New Hampshire's Driver's License photo that was later confirmed by DAVIS to be the same JUDITH BRUEY who had opened the account. Affiant also showed DAVIS a Texas Driver's License photo of DAWN CHELSEA PHILBRICK, Texas License Number #18977356, born 05/25/1981, and DAVIS positively identified the woman in the photo as the same female who often accompanied BRUEY when she picked up the mail for box #324. DAVIS further advised that on occasion a white male, using the name WILLIAM KRAR, would also

accompany BRUEY and PHILBRICK when picking up the mail. BRUEY, PHILBRICK and KRAR picked up the mail for box #324 several times a week and were usually driving either a black Cadillac with Texas license plate XNN 89K or a white pickup truck with New Hampshire License plates.

(8) A check of Texas license XNN 89K with the Texas Department of Public Safety found the car to be registered to DAWN PHILBRICK with an address of 4828 South Broadway, Tyler, Texas, the same address as the Mail Boxes Etc. where KRAR'S box #324 is located.

(9) On November 7, 2002, Affiant conducted a surveillance of a rural secluded residence located at 12471 Oak Springs Road, Tyler, Texas. Affiant observed parked at the residence one white pickup truck with New Hampshire license plates, a silver Nissan Pathfinder with New Hampshire license plate 559 289, registered to a JUDITH BRUEY at 344 East Dunbarton Road, Gofftown, New Hampshire and a U-haul truck with New Hampshire license plate 1078 488, also registered to JUDITH BRUEY at the same address in Gofftown, New Hampshire. PHILBRICK'S black Cadillac was also observed parked at the residence.

(10) Both a National Comprehensive Computer Report and a Choice Point Database Computer report were run on WILLIAM J. KRAR, born 10/05/1940, social security number 049-30-5829. Both

reports found KRAR associated with two Texas addresses since October 2001: 4828 South Broadway, Tyler, Texas and 12471 Oak Springs Drive, Tyler, Texas, in the Eastern District of Texas.

(11) On November 15, 2002, the Federal Bureau of Investigation (FBI) requested a mail cover for box #324 from the Mail Boxes Etc at 4828 South Broadway. During an approximate two month mail cover, affiant obtained several items of interest to include multiple letters from various credit card companies addressed to both WILLIAM J. KRAR and JUDITH BRUEY, two different letters received addressed to a "Mr. Franco" with International Development, a letter received addressed to JUDITH BRUEY from Noonday Storage Co. at 14281 CR 168, Flint, Texas, a priority letter received from KAISERS HOUSE, P.O. Box 176 Pequabuck, Connecticut 06781 with words "DO NOT X-RAY" written on it, a large package addressed to IDC America BILL KRAR, from P.O. Box 176 Pequabuck, Connecticut, a first class envelope/package addressed to BILL KRAR from Kaiser's House in Pequabuck, Connecticut and a letter received from Bushmaster Firearms, Inc. in Windham, Mass. addressed to IDC America. During the midst of the FBI's mail cover, BEE DAVIS advised affiant that BRUEY had mailed a package labeled "machine parts" to Bushmasters, 999 Roosevelt Trail, building #3, Windham, Maine 04062.

(12) Upon analyzing the information from the FBI'S mail cover, affiant's investigation determined Bushmasters located on

Roosevelt Trail in Windham, Maine to be Bushmasters Firearms Inc., a supplier of firearms and various associated equipment. Affiant also found Kaisers House located at P.O. Box 176 in Pequabuck, Connecticut to be Kaisers House Militaria, a supplier of military surplus and collectibles.

(13) On November 19, 2002, BEE DAVIS advised affiant that PHILBRICK had recently moved to Hooksett, New Hampshire and in doing so submitted a change of address for any mail received in her name at Box #324 in the future. DAVIS also said that on one occasion since PHILBRICK moved to New Hampshire, BRUEY had mailed an express mail photo package at her new address in Hooksett, New Hampshire. DAVIS said the package appeared to be filled with photographs.

(14) On January 11, 2003, FBI Special Agent David McIntosh of the FBI's Memphis, Tennessee Office contacted affiant and advised that earlier that day, WILLIAM J. KRAR, born 10/05/1940, had been stopped by a Tennessee State Trooper in Shelby County, Tennessee for a traffic violation. During the course of the traffic stop, two handguns and a small amount of marijuana were discovered in KRAR'S vehicle which led to his subsequent arrest in Tennessee.

(15) On January 15, 2003, Tennessee State Trooper WILLIAM GREGORY provided affiant with copies of his report of arrest of

WILLIAM KRAR on 01/11/2003 in Shelby County, Tennessee. At the time of his arrest, KRAR was driving a rental car he had rented from Avis Rent A Car in Tyler, Texas. GREGORY also provided affiant an inventory of items found during the search of KRAR'S vehicle and copies of numerous documents found in KRAR'S possession. Among the items found in KRAR'S possession at the time of his arrest were one bag containing what is believed to be seven marijuana cigarettes, one syringe of an unknown substance, one white bottle with an unknown white substance, forty wine like bottles of unknown liquid, one (1) 9mm handgun, one (1) .22 handgun, sixteen knives, one Panther stun gun, one Mk 18 smoke grenade, KRAR's United States Passport, three military style packaged atropine injections (a known antidote for several types of nerve gases), two hundred and thirteen 9mm rounds, two 9mm magazines, fifty .22 rounds, one set of handcuffs and keys, thumb cuffs, one pack of five fuse ropes, one pair of binoculars, expandable baton and other various close in hand to hand combat items. Also found in KRAR'S vehicle during his 01/11/2003 arrest were numerous documents one of which was titled "trip" and another "procedure" which appear to be instructions for carrying out some type of covert operation or plan. (Exhibit A), a document titled "alternator" containing instructions on using a covert system of code to communicate with (Exhibit B), a sheet of paper having handwritten notes with the phrases "BACK UP ID", "PUT DOPE ON #1" and "INFO on #1" written on it, (Exhibit C), a sheet of paper having what appeared to be a to do list on it with



the words "CHEMS - DAWN" written on the bottom of the list (Exhibit D), letters addressed to DAWN PHILBRICK at 7 Castle Drive in Hooksett, New Hampshire written by and signed by a ROGER J. MOORE from the International Development Corp. (IDC) 4828 South Broadway, #324, Tyler, Texas 75703, a state of Tennessee birth certificate for WILLIAM FRITZ HOFFNER, a New Life Christian Missionary Alliance, Sacramento, California identification card with KRAR'S picture on it with the name W.F. HOFFNER, and a Maple Leaf Credit Union, Sacramento, California, identification card with the name W.F. HOFFNER with account number of 937480.

(16) Trooper Gregory further advised affiant that during the arrest, KRAR said he was in the process of moving back to New Hampshire and had been on his way there when he was stopped. However, on 01/12/2003, after bonding out of the Shelby County Jail in Tennessee, KRAR'S vehicle was again observed by Trooper Gregory, this time heading west bound on Interstate 40, the opposite direction from New Hampshire.

(17) On January 15, 2003, FBI Special Agent John Goglia, of the FBI's Boston Division advised affiant of a New Hampshire State Police Report detailing the February 2, 1985 arrest of WILLIAM J. KRAR on the charge of false personation of a law enforcement officer. KRAR later entered a plea of Nolo Contendere, was found guilty of the charge and after paying a fine, was released from custody. SA Goglia further advised that

on September 11, 2001, the Hooksett, New Hampshire Police Department had received a report regarding the suspicious activity of WILLIAM J. KRAR. The report detailed that on 09/11/2001, while KRAR and DAWN PHILBRICK were at Morgan Self Storage in Hooksett, where they had two storage lockers rented in the name of JUDITH BRUEY, they got into a conversation with an employee at Morgan Self Storage, JENNIFER GIONET. During their conversation KRAR he said he had known the attacks of 9/11/01 were going to happen and that Los Angeles or Manchester would be next in order to draw attention away from Boston. GIONET reported seeing green metal suitcases and empty canisters in KRAR'S storage locker. KRAR also told GIONET he knew of anti-terrorist groups. Also included in the police report was information from another employee at the storage facility, KATIE SMITH, who advised police that KRAR, who was once the owner of an Army/Navy Store, was not happy living in the United States and wanted to move out of the country. The employee also told police of army type equipment kept in KRAR'S storage locker.

(18) On January 16, 2003, LESLIE DUECKER, manager at Noonday Storage Facility in Flint, Texas, advised affiant that in October of 2001, JUDITH BRUEY rented a 12' X 30' storage locker, #D-7. Since that time BRUEY has also rented a second 12' X 30' storage locker, #D-12. DUECKER provided affiant a copy of BRUEY'S storage rental agreement which also identified DAWN PHILBRICK and WILLIAM KRAR as being entitled to the same access rights as BRUEY, to

include access code, space number and status of account. DUECKER advised that BRUEY, KRAR and up until recently, PHILBRICK, usually frequented their storage facility almost every day. Shortly after obtaining the storage locker at the Noonday Storage Facility, KRAR told DUECKER'S father he was a wholesaler and involved in manufacturing parts for the United States Military. DUECKER advised that since renting the two storage lockers in October of 2001, BRUEY has always paid the monthly rent in cash.

(19) On January 20, 2003, FBI Special Agent John Goglia, of the FBI's Boston Division advised affiant of a 2001 Goffstown, New Hampshire Police report regarding WILLIAM J. KRAR. SA Goglia advised that the report detailed the events surrounding a 06/11/2001 fire at the Self Storage Facility in Goffstown. During the fire at the facility, the fire department was forced to break into several locked lockers in order to fight the fire. When the fire department broke into a locker #B76, they discovered thousands of rounds of ammunition and four firearms. Police were later told that one of firearms, which appeared to be a modified automatic rifle, and all of the ammunition in the locker were owned by Eagle Eye Guns in Candia, New Hampshire, who's owner was EDWARD CUNNINGHAM, Federal Firearms License #6-02-008-01-0F-34155. The owner of the other three firearms in the locker belonged to Eagle Eye Guns employee, WILLIAM J. KRAR. KRAR later told police the three guns, a Colt .32 semi-automatic pistol, a .223 semi-automatic rifle and a model 700 .223 bolt action

Remington rifle, were his privately owned weapons that he kept stored in the locker. During the fire KRAR was asked to remove the weapons and as much of the ammunition as possible in order to prevent the fire from setting off the ammunition if it reached the locker. KRAR and four of his co-workers, which included JUDITH BRUEY and DAWN PHILBRICK, arrived at the locker and loaded all of the ammunition and weapons on a truck before leaving the facility.

(20) On January 21, 2003, SA Goglia provided affiant with a copy of a Hooksett Police Report detailing the 01/14/2003 reinterview of JENNIFER GIONET at Morgan Self Storage, regarding the previously discussed 2001 police report regarding WILLIAM KRAR. During the reinterview of GIONET, she advised that after JUDITH BRUEY had rented two storage lockers in June of 2001, she hardly ever saw BRUEY again. The units were always entered by WILLIAM KRAR and a girl named DAWN LNU (last name unknown). The report goes on to state that GIONET'S description of DAWN LNU matches that of DAWN PHILBRICK. GIONET said KRAR had the locker for ten months and then left without giving any notice. When he was using the locker, GIONET said it was filled with camouflage uniforms and green military boxes. GIONET said she was afraid of KRAR and that he was "wicked anti-American". She said KRAR used to say things to her such as the United States Government was corrupt and he hated the United States Government and all of the cops. He said he hated Americans because they are "money hungry

grubs". KRAR told her he had a company called something like "IBA" and had several businesses in Costa Rica where he could set her up with some good financial investments. KRAR attempted to have GIONET sign some documents allowing him to manage her finances but she never followed through with it.

(21) On January 23, 2003, SA Goglia advised affiant that WILLIAM KRAR'S New Hampshire Driver's License, number #10KRW40051, came back to an address of 7 Colby Bedford, New Hampshire, which is a Mail Boxes Etc. KRAR no longer has a mail box at the business but has since left a change of address of 4828 South Broadway, Texas, the Mail Boxes Etc. in Tyler, Texas. Affiant has also verified that WILLIAM J. KRAR does not possess a Texas Driver's License although he has been in the state of Texas since October 2001.

(22) On January 24, 2003, Avis Rent A Car in Tyler, Texas provided a copy of their 01/10/2003 rental car agreement with WILLIAM KRAR. KRAR rented the vehicle on 01/10/2003 with a return date of 01/24/2003. KRAR gave an address of 7 Colby Court #4-339, Bedford, New Hampshire, which is the address of the Mail Boxes Etc. where KRAR no longer has a mail box.

(23) On January 24, 2003, Special Agent McIntosh provided affiant with a copy of his report detailing his 01/11/2003 interview with WILLIAM J. KRAR in Memphis, Tennessee, following

KRAR'S arrest that same day. Upon the initiation of the interview with the FBI, KRAR declared his home address as being 4828 South Broadway, #324, Tyler, Texas and said he had lived there for one year. KRAR advised he was the Chief Executive Officer for International Development Corp. (IDC) and advised that JUDITH BRUEY was the owner/president of IDC. KRAR said IDC's address is the same as his personal residence. BRUEY owns 85% of IDC and KRAR owns 15% of IDC. KRAR stated IDC manufacturers small parts for AR15 rifles, hopes to manufacture a rifle cooling device, sells pepper spray, sells smoke grenades, sells a variety of items to Bushmaster and sells stun guns. KRAR estimated IDC's total gross sales for 2002 at \$35,000 and estimated his personal income for 2002 at \$6000.00. KRAR told SA McIntosh he had rented a vehicle from Avis Rent-A-Car in Tyler and was on his way to Hooksett, New Hampshire to look for an apartment and visit his girlfriend of three years, DAWN PHILBRICK. KRAR told SA McIntosh the 9mm handgun found in his car was his personal gun he had owned for 10 years and did not have a permit for it. He said the .22 handgun found in the car was his and had belonged to his father. KRAR denied possessing or having any knowledge of how the seven marijuana cigarettes, syringe of brown fluid and the unknown white powder had gotten into his rental car. KRAR further advised SA McIntosh that he didn't sell firearms anymore since his Federal Firearms License (FFL) expired in June of 2001. He said he sold all of his personal weapons and any weapon he sells now, he does so under the FFL of ED CUNNINGHAM of Candia, New

Hampshire.

(24) SA McIntosh also advised that during the interview with KRAR, the contents of KRAR'S wallet were reviewed. Included was an American Express card #378340900522016 in the name of WILLIAM FRANCO, International Dist. KRAR explained that IDC had gotten him a credit card to use for company business using the alias "WILLIAM FRANCO", allowing him not to be harassed by company salesman. KRAR also uses the name W. FRANCO on his business cards as a Vice President of Sales for Griantini Wines. KRAR was also asked about additional items found in his vehicle. KRAR advised that the four false identifications using his picture and the name W.F. HOFFNER, to include a State of Tennessee birth certificate, had been made by a friend as a joke. He said the identifications had been made on a computer. When asked about the documents marked "procedure", "trip", and "alternator", KRAR advised that his girlfriend PHILBRICK, was going through a divorce and a custody battle for her two children. KRAR and PHILBRICK had devised this plan for her to leave her house quickly to get away from her ex-husband. When asked about letters written to PHILBRICK from a ROGER J. MOORE at IDC, KRAR advised MOORE had been an employee who worked for IDC for one month before leaving. When KRAR was asked why MOORE was writing PHILBRICK about a hospital project IDC was involved in that had been dead for over a year, KRAR responded saying he didn't know why. KRAR stated that all of the items recovered from his vehicle

- stun gun, gas mask, handcuffs, etc, were all items sold by IDC. KRAR also told SA McIntosh his only personally owned vehicle is a 1989 Cadillac.

(25) On January 27, 2003, Special Agent Brandon Chenault of the Bureau of Alcohol Tobacco and Firearms (BATF), advised affiant that BATF had no record of WILLIAM J. KRAR ever possessing a Federal Firearms License (FFL). There was a BATF record of an International Development Corp. located in Southlake, Texas possessing an FFL under the names YIN CHUN CHANG, EMILEE CHANG and JOHN H. BROWDER, but the BATF system shows the business was as abandoned on 11/19/1998. Affiant found no links between KRAR'S IDC America and the IDC America in Southlake, Texas.

(26) On January 27, 2002, Bob Kennedy, supervisor for the Social Security Administration (SSA) in Tyler, Texas, advised affiant that a search of the SSA'S computer database on WILLIAM KRAR, 049-30-5829, found that he had not reported an income to the government since 1988. At that time KRAR reported a yearly income of \$2450.00 from the Diamond Lumber Company.

(27) On January 29, 2003, ISRAEL M. ANZALDUA, Director of Law Enforcement and Government Sales for Bushmasters Firearms Inc. provided company information to affiant which stated that Bushmasters had in the past purchased firearms receiver push pins



numerous times from IDC America at 4828 South Broadway, PMB 324, Tyler, Texas 75703. The most recent purchase from IDC America came in January of 2003. During previous purchases by Bushmasters, IDC America gave an address at 7 Colby Court #4-339, New Bedford, New Hampshire. The records also show that from May 1998 to December of 2000 Bushmaster also purchased approximately 600 automatic rifle magazines and 500 trigger pins from IDC America.

(28) On February 17, 2003, SA Goglia provided affiant additional information regarding the Boston FBI's previous investigation involving KRAR. On January 15, 2003, SA Ernie Yerrington of the BATF in New Hampshire had advised the FBI that the BATF still had an interest in talking with WILLIAM KRAR about a modified rifle seized in June of 2001 at a storage facility rented by KRAR in Goffstown, New Hampshire. SA Yerrington also advised SA Goglia he remembered working a previous investigation against KRAR and an individual named SEAN BOTTOMS in 1995. KRAR and BOTTOMS were the subjects of an investigation where BOTTOMS had made some serious allegations regarding he and KRAR's involvement in a plan to carry out a specific act of domestic terrorism against the United States Government.

(29) SA Goglia provided affiant further documentation confirming the fact that an FBI/ATF investigation had in fact been conducted in 1995 regarding SEAN PATRICK BOTTOMS, aka JOHN

LEWIS and a WILLIAM KARR, aka BILL FRENCH, aka WILLIAM FRANCO involvement in an alleged domestic terrorism plot. The case information states that in 1995, BOTTOMS was arrested in Tennessee for making pipe bombs and a search of BOTTOMS' residence at that time recovered large amounts of bomb making components along with a large number of firearms and ammunition. Also found during the search was a business card for a WILLIAM KARR, IDC America, 52 Maple Street, Manchester, New Hampshire. Case documentation indicated that investigators determined BOTTOMS had resided in Manchester, New Hampshire in late 1994 early 1995 and had used IDC America's address as his own on his driver license.

In July of 1995 KARR was contacted and interviewed by ATF regarding BOTTOMS at which time he told investigators he had sold BOTTOMS ammunition and military surplus. Documents show that after being indicted on federal charges regarding the explosives, BOTTOMS began cooperating with the government regarding militia activities. During these debriefings BOTTOMS advised he had met KARR several years earlier in Nashville, Tennessee while KARR still had his business, IDC America, located there. BOTTOMS said KARR was an ex-special forces and special operations group veteran of the Vietnam War who was who was familiar with explosives. BOTTOMS and KRAR both had a dislike for the United States Government and its activities and BOTTOMS said KARR was actively involved in the militia movement. KARR, who was also using the alias, BILL FRANCO at the time, was selling handguns,

without a federal firearms license, which KARR told him were obtained from the Nashville Police Department and had been set to be destroyed. According to BOTTOMS, KARR relocated his business to Manchester, New Hampshire in July of 1994. From September 1994 through February 1995, BOTTOMS stayed in close contact with KARR and his business in New Hampshire. BOTTOMS went on to claim he and KARR's involvement in an alleged domestic terrorism plot. BOTTOMS later failed a FBI/ATF polygraph examination regarding details about any anti-government plot between him and KARR and subsequently admitted making up the story.

(30) The documentation provided to affiant by SA Goglia also stated that during this same time frame around 1995, a federal law enforcement source had advised that a militia member known to law enforcement for his strong and violent anti-government views had been spending a lot of time at KARR'S business, IDC America, in Manchester, New Hampshire. The source believed KARR was a white supremacist due to the anti-Semitic and anti-black literature at KARR'S business location. Source also advised KARR was a good source of covert weaponry for white supremacist and anti-government militia groups in New Hampshire. Further investigation at that time determined that JUDITH BRUEY was the president of KARR'S company, IDC America. On one occasion BRUEY, not knowing an individual visiting the business was a federal agent, indicated to the agent her dissatisfaction with the United States Government regarding its policies towards its citizens and

said she believed the government was restricting the flow of military surplus because it was afraid the military surplus would end up in the hands of citizens rejecting their government. During that same time frame a FBI/ATF surveillance was conducted at KARR and BRUEY'S business, IDC America. During the surveillance, a large number of vehicles were observed at the business including the vehicle of a known militia member with strong/violent anti-government views. Agents conducting the surveillance concluded some type of organized meeting was taking place at IDC America. During this same surveillance two unknown individuals had been observed leaving the business, one of whom was holding in open view, a short barreled shotgun or rifle.

(31) SA Goglia also provided affiant a copy of an FD-302 detailing BOTTOMS' September, 29, 1995, failed polygraph examination and subsequent interview regarding the plot between he and KARR. After failing the polygraph and admitting he had lied about the story, BOTTOMS did stand by his earlier allegations that KARR, without a federal firearms license (FFL), was selling handguns. BOTTOMS advised he had seen KARR with eight to twelve handguns himself. The FD-302 also states that during the interview with BOTTOMS, he was twice asked about his relationship with KARR and more specifically why he had traveled from Tennessee to New Hampshire. BOTTOMS declined to answer the questions both times.

(32) Affiant believes based on earlier detailed documentation in this affidavit regarding WILLIAM J. KRAR, his continued use of the alias "BILL FRANCO" and still current involvement and association with IDC America and JUDITH BRUEY, that the WILLIAM KARR discussed in the SA Goglia's above detailed information regarding the anti-government activities, was an alias used by the actual person, WILLIAM J. KRAR.

(32) FBI Intelligence Analyst DAWN REYNOLDS advised affiant that on February 18, 2003, officials for The Dean Water Company were contacted regarding the address of 12471 Oak Springs Road, Tyler, Texas and confirmed that a JUDY BRUEY of 4828 South Broadway, PMB #324, Tyler, Texas is paying water utilities for that particular residence.

(33) On February 20, 2003, Special Agent Lou Morales from the Office of the Inspector General (OIG) for the Social Security Administration (SSA) provided the affiant with a response to an earlier request by the FBI regarding WILLIAM J. KRAR'S social security number. This earlier request was based on the results of a 01/29/2003, a computer database National Comprehensive Report (NCR) run on WILLIAM J. KRAR, born 10/05/1940, social security number (SSN) 049-30-5829. The results of the NCR showed KRAR'S SSN not only being associated with the another name, WILLIAM J KOAR, but also identified three additional SSN's associated with the name WILLIAM J KRAR, born 10/05/1940: 049-30-5809, 049-30-

5824 and 099-30-5720. The NCR showed that SSN 049-30-5809 had been originally issued to a PAULINE HEDDING, with a death claim being filed on it in February 1994 and SSN 049-30-5824 having been originally issued to a WINNIE MCCRAVEY and it also having a death claim filed on it in October 1976. SA Morales' SSA-OIG report advised affiant that the correct SSN issued to WILLIAM J. KRAR, born 10/05/1940, is 049-30-5829. SA Morales' report also confirmed that SSN's 049-30-5809, 049-30-5824 and 099-30-5729 do not match with the name WILLIAM J. KRAR.

(34) Affiant believes the above information not only clearly lays out WILLIAM KRAR's involvement in the production, possession, and distribution of fraudulent identifications but also shows an ongoing conspiracy between KRAR and JUDITH BRUEY, both doing business as IDC America, to produce and distribute these false identifications. This is based on the following factors:

- KRAR'S statements to the FBI on 01/11/2003 confirming his partnership with JUDITH BRUEY and their joint connection with IDC America.
- KRAR'S documented historical associated and connection with JUDITH BRUEY and IDC America.
- KRAR'S mailing of fraudulent identifications to EDWARD FELTUS in December of 2001 using IDC America's return address of 4828 South Broadway, #324, Tyler, Texas.
- The fact that the false identifications mailed to

FELTUS were packaged along with information related to other IDC America's business ventures.

- The registration and use of Mail Box Etc. box #324, 4828 South Broadway, Tyler, Texas by both JUDITH BRUEY and WILLIAM KRAR, all under the name of IDC America.
- KRAR and BRUEY'S use of 12471 Oak Springs Road, Tyler, Texas as their physical address.
- KRAR'S documented use of BRUEY'S name and personal information to pay for business services and to pay for utilities.
- KRAR and BRUEY sharing equal access on two rented storage lockers located in Flint, Texas.
- Witnesses placing KRAR and BRUEY together at both their Mail Boxes Etc. mail box #324, and two storage lockers in Flint, Texas.

(35) It is further the affiant's belief that the conspiracy between KRAR and BRUEY to produce, possess and distribute fraudulent identification documents is more than likely just one facet of a much more involved criminal scheme which could potentially include plans for future civil unrest and/or violent civil disorder against the United States Government. Affiant strongly believes the above information combined with facts set forth below, constitutes probable cause for the issuance of a federal search warrant for KRAR and BRUEY'S residence in Tyler, Texas for not only evidence of the production and distribution of

fraudulent identifications but also evidence of other potential future violent criminal acts against the United States Government. These facts include:

- KRAR, BRUEY and IDC America's documented historical affiliation with and connection to known militia groups and/or individuals holding strong and sometimes violent anti-government views, to include hosting meetings with these individuals at their place of business, IDC.
- KRAR'S previous arrest for impersonating a law enforcement official.
- KRAR'S past association with individuals involved with weapons and bomb making.
- Past suspicious activities of KRAR regarding his involvement in dealing firearms, ammunition and his outspoken anti-government views and associations.
- KRAR'S admitted sales of firearms, confirmed by the BATF to have been without KRAR ever possessing a Federal Firearms License (FFL) himself.
- KRAR'S apparent multiple false statements to the Federal Bureau of Investigation on 01/11/2003 to include stating his home address as 4828 South Broadway, the actual address of Mail Boxes Etc. where he and BRUEY currently receive their mail, KRAR admitting selling firearms prior to his federal firearms license (FFL) expiring in June 2001, a FFL which BATF has no record of KRAR ever possessing, KRAR'S claim that the seven marijuana cigarettes,



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syringe of brown liquid and the unknown white powder, all taken from his rental car during his 1/11/2003 arrest, did not belong to him, his explanation that a credit card, also found in his possession on 01/11/2003, in the name of WILLIAM FRANCO, was only for the purpose of avoiding harassment by company salesman and finally KRAR'S explanation of a photo ID with his picture on it and a state of Tennessee birth certificate both under the name of WILLIAM HOFFNER found in his wallet at the time of his arrest, had been given to him by a friend as a joke.

- KRAR'S arrest on 01/11/03 for possession of illegal drugs and illegally possessing firearms.
- KRAR'S possession of fraudulent identity documents at the time of his 01/11/2003 arrest.
- KRAR'S possession of various suspicious military equipment, to include gas mask, smoke grenade, fuse ropes, stun gun, knives, lock pick set, thumb cuffs and three atropine injections at the time of his 01/11/2003 arrest.
- KRAR'S possession of various suspicious documents at the time of his 01/11/2003 arrest, some of which contained directions for executing a covert type plans/operations to avoid law enforcement.
- KRAR'S continued association with admitted militia members.
- KRAR'S and BRUEY'S documented stated hatred for the United States Government and in KRAR'S case a complete

dislike for all Americans as a whole and for law enforcement.

(36) It is Affiant's opinion that, based on investigative experience as a Special Agent in the FBI and from numerous consultations with other experienced Special Agents of the FBI, that individuals holding strong anti-government views such as KRAR and BRUEY, often times are either members of or associated with some type of militia or organization which advocates the same type of beliefs. It is these people who, because of their hatred, distrust and often time adamant belief there is a greater conspiracy against them by the United States Government, take certain actions they believe will help protect them from what they believe is an overly intrusive government who is always watching them in an attempt to monitor their daily lives. It is also these same individuals who have at times in the past resorted to expressing their frustrations and hatred for the government by plotting to and unfortunately sometimes successfully carrying out violent terroristic acts of civil unrest against the United States Government and its citizens. These violent acts most often times result in serious injury and/or loss of life. It is the Affiant's opinion that the behavior and activities of these individuals just discussed are similar to those of WILLIAM J KRAR documented in this affidavit.

Some of these behaviors and activities include the

following: the use of fraudulent identifications, the use of multiple identities, failure to be truthful or forthcoming when questioned by law enforcement about personal information and/or activities, making known a hatred and disdain for the United States Government, the use of off-site locations, such as post office boxes and storage lockers to help further conceal physical residences and personal activities, and finally a strong interest and involvement in the use, sale and or proliferation of firearms, ammunition and military related equipment to other like-minded individuals with strong and sometimes violent anti-government views.

(37) The facts set forth herein support the conclusion that WILLIAM J. KRAR has violated Title 18, United States Code Section 1028, which prohibits knowingly and without lawful authority producing an identification document or a false identification document or knowingly transferring an identification document or a false identification document knowing that such a document was stolen or produced without lawful authority.

(38) As a result, Affiant believes there is probable cause for the issuance of an arrest warrant for WILLIAM KRAR and a search warrant for the described premises and any other structures and or vehicles which may be located on the acreage of the residence under WILLIAM J. KRAR or JUDITH BRUEY'S control, for items which are more particularly described in Attachment

"2", and which will result in the recovery of evidence of criminal acts or future planned criminal acts. In addition, it is Affiant's belief based on KRAR's conflicting statements regarding his admitted sales of firearms, which Affiant has shown would have been done without a Federal Firearms License (FFL), a search of KRAR's residence could also potentially produce evidence, including the recovery of actual firearms, firearms related equipment and records relating to the purchase, receipt, and sale of firearms, which will also show KRAR's violation of various federal firearm laws.

Further Affiant sayeth not.

  
BART B. LAROCCA, Special Agent  
Federal Bureau of Investigation

SWORN to before me and subscribed in my presence at  
Tyler, Texas, on this the 4<sup>th</sup> day of April, 2003.

  
UNITED STATES MAGISTRATE JUDGE

PROCEDURE

MEETING PLACES-

SCRANTON, PENN.

HARRISBURG, PENN

WINCHESTER, VA

ROANOKE, VA

BRISTOL, TENN

KNOXVILLE, TENN

CHATTANOOGA, TENN

JACKSON, MISSISSIPPI

SHREVEPORT, LOUISIANA

CITIES TO BE REFERRED TO AS "ZONES" SCRANTON WOULD BE "ZONE ONE" SHREVEPORT "ZONE NINE"

MOTELS AND OR MEETING PLACES TO BE LISTED IN PRIORITY ONE THRU FOUR i.e.,

MOTEL SIX

STATE PARK

WAL MART

HOSPITAL - DESIGNATED AS "MP-4"

ALL PHONE NUMBERS USE TEN CODE

TIME OF DAY "ACTUAL PLUS FOUR HOURS" i.e., WE MEET AT 10 PM - ACTUALLY SIX PM

IF ALTERNATE MEETING PLACE IS REQUIRED USE ALPHABET CODE - SIMPLY REFER IN OUR CONVERSATION AS "WRITE DOWN THESE NEW PART NUMBERS" REFER TO FIRST WORD AS PART NUMBER ONE ETC.

VARIOUS LEVELS OF THREAT IF GRAB AND RUN IS USED.

"TORNADOES ARE EXPECTED IN OUR AREA"- THINGS VERY

HOT -LAY LOW OR CHANGE YOUR TRAVEL PLANS

"MAJOR THUNDER STORMS ARE PREDICTED" THEY ARE

LOOKING PRETTY HARD BE CAUTIOUS

"LOTS OF LIGHT STORMS ARE PREDICTED" MOVE FAST

BEFORE THEY LOOK ANY HARDER WE HAVE A LIMITED WINDOW REMAINING.

USE ONLY PREPAID PHONE CARDS - EVERY MOVE A CELL MAKES IS TRACED,

LEAVE BEHIND SOME INTERESTING INFORMATION ABOUT

"CALIFORNIA" OR "FLORIDA" SUCH AS HOTEL INFO, TRAVEL COSTS ETC. WE WANT ALL LOOKING IN WRONG DIRECTION.



(A)

#7

62-001-1000-1000

**TRIP**  
**WHOSE NAME IS VEHICLE REGISTERED IN?**  
**SPARE PLATES**  
**NO USE OF CELL PHONE ONCE TRIP HAS BEGUN.**  
**LIMIT AMOUNT OF STOPS MADE UNTIL AT LEAST**  
**IN PENN.**  
**CAN APPEARANCE OF VEHICLE BE EASILY CHANGED?**  
**SUGGEST USING FASTEST ROUTE UNTIL AT LEAST PENN.**  
**IF MOTELS ARE USED STAY WITH SMALL INDEPENDENTS**  
**LG CHAINS ARE NETWORKED FOR INFO.**  
**ALTERNATE ID FOR HOTELS ETC.**

**PLANS FOR STARTING TRIP- DATE - 2 PACKAGES**  
**OR ONE - SUGGEST A COVER TO BE GONE A COUPLE**  
**OF DAYS THE LONGER THE BETTER.**

**DO YOU WANT TO WAIT FOR ME TO ARRIVE IF**  
**POSSIBLE - THIS WOULD ENABLE US TO LEAVE TOGETHER**  
**WITHOUT THE PACKAGES BEING AWARE?**

**YOU WILL NEED CASH, PRE CHARGED PHONE CARD**  
**SPARE GAS CAN AND ALL PLANNING IN PLACE.**

**WOULD SUGGEST YOU SEND LETTER OF RESIGNATION**  
**ALONG WITH CELL PHONE BACK TO "COMPANY" USUAL**  
**CRAP "VERY SORRY TO INFORM YOU THAT DUE TO**  
**PERSONAL PROBLEMS I FEEL THAT MY RESIGNATION**  
**IS IN ORDER,, THANK YOU, HERE IS YOUR CELL PHONE**  
**YADDA, YADDA, YADDA. WHEN THEY SHOW UP THEY CAN**  
**READ YOUR SAD LETTER ETC.**

**ARE PLANS TO TRAVEL IN CASE OF PROBLEMS OR**  
**ARE YOU LEAVING ANYWAY?**

*KIDS- WILL THEY ACCEPT MOVE*  
*OR CAUSE TROUBLE.*



SEND  
RECEIVE

Alternator (going to code)

I A

N B

C C

T D

Z E

J F

M G

P H

Y I

R J

S K

L L

Q M

A N

X O

E P

G Q

W R

O S

K T

U U

D V

F W

V X

H Y

B Z

all ph. no. use 10 code

Times: actual + 4 hrs

If Grab + Run:

"Tornadoes are expected in our area" Very Hot -

Lay low or change travel plans

"Major thunderstorms are predicted" Looking hard

Be cautious

"Lots of light storms are predicted" move fast -

trail getting warm - limited window

Zone (City)

1 Scranton, PA

2 Harrisburg, PA

3 Winchester, VA

4 Roanoke, VA

5 Bristol, TN

6 Knoxville, TN

7 Chattanooga, TN

8 Jackson, Miss.

9 Shreveport, LA

MP (Meeting Place)

1 Motel

2 State Park

3 Walmart

4 Hospital

ie - "zone 4, MP 3"

(Roanoke, VA @ Walmart)

Part numbers (alphabet code)

Twin Peaks (contact mike + dawn)

Chili (Chelsey) Beans (Brandon)

Cat (T1) Dog (Fat ass) Donkey (T2)



WORK ON RON  
NEED REASON FOR COMING

MOTELS CONCERN - BRICK YARD??

BACK UP ID

PUT DUPE ON #1

INFO ON #1





WERS

D. IN-LOVER WAS CAUGHT - PHARA REP  
MAGIC SHOW POWDER

COITZ

Storage  
Apartment - DONNA (C-2) (DONNA CLARK)

WWW  
LAKC BAKERY  
COM  
REAL MEET  
OUR AGENTS

ATT LETTER

COPIES - Non Disclosure & CONTRACT

FINISH "PRIMO" & COPY

✓ SART WERK BOX

BUILD WINE CATALOGS

✓ STUFF IN UNITS

✓ GIVE AWAY WINES → 10-12 BOTTLES -

✓ MOTEL BOOKS

✓ RENTAL CAR

✓ A.L. BIG TRUCK

✓ CHEMS - DAWN

